

EXHIBIT 3

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REGMON HAWKINS,
*individually and on behalf of all
others similarly situated,*

Plaintiff,

v.

S2VERIFY, a foreign limited
liability company,

Defendant.

CASE No. 4:15-cv-03502-
WHA

**DECLARATION OF
DEVIN H. FOK IN
SUPPORT OF
PLAINTIFF'S MOTION
FOR ATTORNEY'S FEES
AND COSTS**

DECLARATION OF DEVIN H. FOK

1 I, DEVIN H. FOK, declare:

2 1. I am one of the lead counsel of record for Plaintiff Regmon Hawkins in
3 the above-cited case. I make this Declaration in support of Plaintiffs' Motion for
4 Attorney's Fees and Costs. I am over 21 years of age, of sound mind, capable of
5 executing this Declaration, and have personal knowledge of the facts stated herein, and
6 they are all true and correct.

7 2. I am the owner and proprietor of DHF Law, P.C., and I am a 2007 graduate
8 of the University of California Los Angeles School of Law. I have been appointed by
9 this Court as one of the Class Counsel in this action. (*See* Dkt. 82 at 12.). My relevant
10 experience, expertise, and a listing of other cases in which I was appointed as class
11 counsel is set out in more detail in my previous declaration submitted in this case. (*See*
12 Dkt. 65-8.)

13 3. My hours are contemporaneously recorded using an online-based record
14 keeping software, Case Notes. As of today, I have personally spent more than 30.4
15 hours on this case. Those hours relate mostly to initial factual investigation, discovery
16 (including defending Plaintiff Regmon Hawkins's deposition in Oakland, California
17 and assisting my co-counsel, Caddell & Chapman, with responding to discovery
18 requests), consulting with Caddell & Chapman on strategic decisions, and
19 communicating about the case to Mr. Hawkins. My firm took this case wholly on a
20 contingent basis.

21 4. An attorney who worked as Counsel to my firm, Joseph Lee, spent
22 approximately 5.4 hours in this action drafting and revising the Original Complaint.
23 Mr. Lee is a 2006 graduate of the University of California Los Angeles School of Law.
24 He has significant experience representing individuals in employment and consumer
25 law matters.

26 5. The total hours my firm spent on this case is 35.8 hours. My hourly rate,
27 which was recently approved in *Watkins v. HireRight, Inc.*, Case No. 3:13-cv-01432-
28

1 MMA-BLM (C.D. Ca 2013), is \$600 per hour. Mr. Lee's hourly rate is \$425 per hour.
2 As of December 28, 2016, my firm's combined lodestar is \$20,535.00.

3 6. Both my rate and Mr. Lee's rate are reasonable and customary for
4 attorneys of our background and experience practicing within the Northern District of
5 California.

6 7. I have incurred \$1,232.81 in costs related to the complaint filing fee, as
7 well as for my travels to Oakland from Los Angeles to defend the deposition of the
8 Named Plaintiff. A summary of those expenses is included in the chart attached as
9 Exhibit B to my co-counsel Michael Caddell's declaration.

10 8. I declare under the penalty of perjury under the laws of the United States
11 that the foregoing is true and correct. Executed December 28, 2016 at Pasadena,
12 California.

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15 /s/ Devin H. Fok
16 Declarant, Devin H. Fok
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